

Appl. No.: 10/085,010
Amdt. dated 09/29/2006
Reply to Office action of July 17, 2006.

REMARKS/ARGUMENTS

Claims 12-33 are currently pending in the present application. In the Office Action dated July 17, 2006, Claims 12-31 were allowed. Claims 32 and 33, however, were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,911,121 to Andrews ("Andrews"). Applicants have amended independent Claim 32 and dependent Claim 33. As explained below, Applicants respectfully submit that the claimed invention of amended Claims 32 and 33 are patentably distinct from the Andrews patent. As such, Applicants respectfully request reconsideration and allowance of all of the pending claims of the present application.

Independent Claim 32

Independent Claim 32 is directed to a wireless communication terminal comprising a first user exchangeable cover part and a second user exchangeable cover part configured to be interchangeable with the first user exchangeable cover part. The first user exchangeable cover part comprises a first type of user interface, and the second user exchangeable cover part comprises a second different type of user interface. Andrews describes two exchangeable cover parts wherein one cover part has more keys on the keypad than the other. *See* Andrews, FIGS. 6 and 8. The Office Action rejects Claim 32 arguing that the two keypads disclosed in Andrews are two different types of user interface.

According to a dictionary definition, the word "type" refers to "a particular kind, class, or group" or "something distinguishable as a variety." *See* MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY, 11th ed., p. 1354. Thus, a keypad should only be considered one type of user interface. Other types of user interface may include such types as joysticks, touch pads, or touch screens, as described in the specification of the present application. Therefore Applicants submit that the two keypads described by Andrews do not disclose two different types of user interface. However, in order to further distinguish Claim 32 from the Andrews disclosure, Claim 32 has been amended to further recite that "the second user exchangeable cover part comprises a second different type of user interface not on the first user exchangeable cover part." Therefore, independent Claim 32 and dependent Claim 33 are patentably distinct from the Andrews disclosure. As such, all of the claims of the present application should be in condition for allowance.

Dependent Claim 33

Dependent Claim 33, which depends from Claim 32, is patentably distinct from the Andrews reference for reasons in addition to the reasons described above with respect to Claim 32. Specifically, Claim 33 further recites wherein the first type of user interface comprises a keypad, and wherein the second type of user interface comprises a touchpad or a touch screen. The Office Action rejects Claim 33 by arguing that Andrews discloses wherein one cover comprises a keypad (citing the keypad of one cover, e.g., the cover of FIG. 6) and wherein the other cover comprises a touch pad (citing the keypad of the other cover, e.g., the cover of FIG. 8). It is well known in the art that a touch pad is different than a keypad, and that a touch pad has different structure and different advantages and disadvantages compared to a keypad. More particularly, a keypad, such as the keypad disclosed by Andrews, comprises one or more physically distinct keys, while a touchpad generally comprises a flat or continuous surface that responds to touching of the surface. As such, a keypad should not be considered the same device as a touch pad.

Therefore, Andrews does not teach or suggest a wireless communication terminal where a user exchangeable cover part having a keypad can be exchanged for a different user exchangeable cover part having a touch pad or a touch screen. Although Andrews shows that different covers could have different keypads by simply removing one or more of the individual keys, nothing in Andrews discloses exchangeable cover parts having different types of user interfaces, such as a touchpad on one cover and a keypad on another. In order to clarify that the claimed touchpad is a type of user interface different from a keypad, Claim 33 has been amended to recite “wherein the first type of user interface comprises a keypad, and wherein the second type of user interface comprises a touchpad or a touch screen in addition to or other than a keypad.” Therefore, amended Claim 33 is not anticipated by Andrews and is patentable over Andrews for these additional reasons.

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Conclusion

In view of the remarks and amendments presented above, it is respectfully submitted that the claims of the present application are in condition for allowance. It is respectfully requested that a Notice of Allowance be issued in due course. The Examiner is requested to contact Applicants' undersigned attorney to resolve any remaining issues in order to expedite examination of the present application.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,



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